

1/25/06-03852

**Capito, Bonnie P CIV NAVFAC Lant**

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**From:** Jackson, Rodger W CIV NAVFAC Lant  
**Sent:** Thursday, January 26, 2006 9:08 AM  
**To:** Capito, Bonnie P CIV NAVFAC Lant  
**Subject:** FW: Response to Comments, SWMU 303/318 RFI  
**Attachments:** Response to DENR Comments RFI Sept 05.doc

Lejeune Site File

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-----Original Message-----

**From:** Randy McElveen [mailto:Randy.McElveen@ncmail.net]  
**Sent:** Wednesday, January 25, 2006 15:55  
**To:** Louise.Palmer@CH2M.com  
**Cc:** kenneth.w.cobb@usmc.mil; Jackson, Rodger W CIV NAVFAC Lant; JCULP@mbakercorp.com  
**Subject:** Re: Response to Comments, SWMU 303/318 RFI

Good afternoon Louise,  
my comments are on the attachment in yellow highlight.  
Dave Lilley is in the process of reviewing the responses to the HH and Eco Risk assessments. I will forward his responses when he has completed them.  
Thanks,  
Randy McElveen, NC Superfund Section

Louise.Palmer@CH2M.com wrote:

Randy, please review the attached responses to comments for the referenced report, and let us know if you have any questions or items to discuss. We will not finalize the report until we get your concurrence on these responses.

*Louise Palmer*  
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Charlotte, NC 28217  
704 329-0072  
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"He is no fool who gives what he cannot keep to gain what he cannot lose."

1/26/2006

Jim Elliot, Shadow of the Almighty

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1/26/2006

# Response to Comments, NC DENR

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## SWMU 303/318 Draft RFI, September 2005

Randy McElveen, 11/24/2005

### General Comment

The SWMU 303/318 RFI Report appears to be in good order and represents the data well. Please notify the NC Superfund Section Representative as to the days that additional work will be done on base.

**Response:** The NC Superfund Section Representative will be notified when additional work is scheduled.

### Specific Comments

1. The first paragraph at the top of page 2-8 is inconsistent with EPA SOPs and State guidance and practice for purging and sampling monitoring wells for RCRA Waste. Before varying from the EPA SOPs for groundwater sampling, proposed purge and sampling changes must be discussed with the partnering team to assure that proper techniques are being used consistent State and EPA guidance. At a minimum the State requires that one well volume be purged prior to sampling and purging and sampling should be done at a reasonable extraction rate not to include micro purge rates.

**Response:** Purging and sampling at SWMU 303/318 were conducted in accordance with the approved work plan. This was discussed at a recent partnering meeting. However, in the future, purging and sampling will follow the revisions described in the new Master Sampling Plan, as approved.

I have some significant concerns about the way this sampling work plan and the Master Sampling Plan is worded (primarily the "Low flow sampling" technique). It allows a sampler to basically micro purge significantly less than 1 well volume as long as the chemical parameters stabilize. If necessary we can have a conference call between the State, the Navy and their consultants in order to discuss this issue. This issue has not been discussed within our RCRA partnering team. If a discussion has occurred in the past please inform me of it and provide appropriate letters and conclusions. I may have made similar comments on the last version of the Master Sampling Plans.

Similar issues are being discussed with the CERCLA Partnering team. If the Master Sampling Plans do not include a minimum of one well volume, I think it needs to be revised accordingly. Generally speaking the State of NC samples 3 well volumes even when low

flow sampling. This sampling procedure could come back to cause problems for us in the future if we do not correct it now.

Potable well PSWAS4140 is labeled as PSWHP-4140 in the last sentence at the top of page 3-3. Please make appropriate changes.

**Response:** The well designation on page 3-3 will be changed to PSWAS-4140.

2. Figure 3-9 shows the groundwater contour map of the Upper Castle Hayne Aquifer as of February 2005. Why is there such a significant difference in groundwater elevation data and groundwater flow direction between January 2005 (Figure 3-10) and February 2005 (Figure 3-9)? If Figure 3-9 under sparging conditions at Site 86 please discuss this in the appropriate sections of the report and make a note to that effect on Figure 3-9.

**Response:** A note will be added to Figure 3-9. However, Section 3.3.2 discusses the significant difference in groundwater elevation and flow direction on pages 3-7 and 3-8.

3. As stated in the last paragraph on page 8-2 the soil data and shallow groundwater data indicate that the TCE and degradation products in the intermediate and deep aquifer are not site related. Will there be an additional effort to locate the source of the TCE in this area or will the plume be treated along with the 303/318 plume?

**Response:** K. Cobb of EMD is preparing a presentation for the MCB Partnering Team to discuss the site and potential actions. It is our understanding that the Partnering Team will recommend a path forward following the presentation in March 2006.

4. The recommendations at the bottom of page 8-4 include removal of contaminated soil beneath the wash pad. Will this include removal of the surface contamination at SWMU 318-SS01 and SWMU318-IS02 as discussed in the first paragraph on page 8-4?

**Response:** The Interim Measure is expected to include all the soil contamination in the vicinity of the wash pad.

5. Dave Lilley with the NC Superfund Section is in the process of reviewing the Human Health and Ecological Risk Assessment sections of the Report. His comments will be forwarded when they are completed.

**Response:** Responses to risk assessment comments are attached.